

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Case No. 20-33948 (MI)
Fieldwood Energy III LLC, et al.,	§	
	§	Chapter 11
Post-Effective Date Debtors¹.	§	
	§	Jointly Administered

**STIPULATION AND AGREED ORDER EXTENDING RESPONSE DATE ON PLAN
ADMINISTRATOR’S OBJECTION TO PROOFS OF CLAIM FILED BY XTO
OFFSHORE INC., HHE ENERGY COMPANY, AND XH, LLC
[Relates to Dkt. No. 2842]**

This stipulation and agreement (the “**Stipulation**”) is entered into by and among (i) David Dunn, the plan administrator (the “**Plan Administrator**”) appointed pursuant to the Notice of (I) Entry of Order Confirming Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors [Docket No. 2016])²; and XTO Offshore Inc., HHE Energy Company, and XH, LLC (collectively, “**XTO**”) regarding the Plan Administrator’s Objection to Proofs of Claim of XTO Offshore Inc., HHE Energy Company, and XH, LLC [Docket No. 2842] (the “**Objection**”). The Parties hereby stipulate and agree as follows:

WHEREAS, on or about November 24, 2020, XTO timely filed Proof of Claim Number 666 (the “**XTO Claim**”).

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III, LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “Post-Effective Date Subsidiaries”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtor), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

² Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to such terms in the Plan.

WHEREAS, the Plan Administrator filed his Objection on August 17, 2023, which included a response date of September 18, 2023 and an initial pre-trial hearing on October 2, 2023 at 10:30 am CT.

WHEREAS, the Parties filed a Stipulation and Agreed Order Extending Response Date and Resetting Hearing Date on Objection on September 12, 2023 [Docket No. 2878] (“Initial Stipulation”); which included a response date of October 20, 2023 and an initial pre-trial hearing on November 6, 2023 at 10:00 am CT.

WHEREAS, on September 12, 2023, the Court entered the order granting the Initial Stipulation [Docket No. 2882].

WHEREAS, the Parties filed a second Stipulation and Agreed Order Extending Response Date and Resetting Hearing Date on Objection on October 18, 2023 [Docket No. 2953] (the “Second Stipulation”); which included a response date of December 1, 2023 and an initial pre-trial hearing on January 24, 2024 at 9:00 am CT.

WHEREAS, on October 20, 2023, the Court entered the order granting the Second Stipulation [Docket No. 2955].

WHEREAS, the Parties filed a third Stipulation and Agreed Order Extending Response Date and Resetting Hearing Date on Objection on December 1, 2023 [Docket No. 2976] (the “Second Stipulation”); which included a response date of December 22, 2023 and retained an initial pre-trial hearing on January 24, 2024 at 9:00 am CT.

WHEREAS, on December 4, 2023, the Court entered the order granting the Third Stipulation [Docket No. 2977].

WHEREAS, the Parties have agreed to enter into and jointly submit this Stipulation further extending XTO’s response date but retaining the date of the initial pre-trial hearing in connection with the Objection.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

1. XTO's deadline to respond to the Objection is extended to and through January 10, 2024, subject to further extensions based on the Parties' agreement.

2. The initial pre-trial hearing on the Objection remains set for January 24, 2024 at 9:00 a.m., or such later time as the Court directs.

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first written below.

IT IS SO ORDERED

Dated: _____

UNITED STATES BANKRUPTCY JUDGE
MARVIN ISGUR

**BOND ELLIS EPPICH SCHAFFER JONES PORTER HEDGES LLP
LLP**

/s/ Aaron Guerrero

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**ATTORNEYS FOR XTO OFFSHORE
INC., HHE ENERGY COMPANY, AND
XH, LLC**

**ATTORNEYS FOR DAVID DUNN, PLAN
ADMINISTRATOR FOR THE POST-
EFFECTIVE DATE DEBTORS**

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of December, 2023 a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Aaron J. Power

Aaron J. Power